



April 21, 2000

Dockets Management Branch (HFA-305) 4 00 APR 26 P2:45  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, Maryland 20852

To the attention of Docket Manager:

Comments by the Association of California Water Agencies (ACWA)  
On the Food and Drug Administration (FDA) Draft Study Report:  
Feasibility of Appropriate Methods on Informing  
Customers on the Contents of Bottled Water (65 FR 8718)

*ACWA's mission is  
to assist its members  
in promoting the  
development,  
management and  
reasonable beneficial  
use of good quality  
water at the lowest  
practical cost in an  
environmentally  
balanced manner.*

The Association of California Water Agencies (ACWA) appreciates the opportunity to submit comments on the Food and Drug Administration's (FDA) draft study report on the feasibility of appropriate methods on informing customers on the contents of bottled water. ACWA includes nearly 450 public water agencies in California. Our members serve over 90% of the water delivered in the state for domestic, agricultural, and industrial uses.

ACWA is very supportive of the need to maintain good communication with consumers on drinking water quality issues. For over a decade California's Department of Health Services has required annual reports to customers on the quality of drinking water provided by water systems. ACWA members were part of the state workgroup that developed guidelines to implement the annual water quality report requirements. These requirements were the basis for the federal Safe Drinking Water Act (SDWA) Amendments of 1996's Consumer Confidence Report (CCR) rule implemented by the U.S. Environmental Protection Agency (EPA).

ACWA members value the opportunity to keep customers informed on tap drinking water quality and have felt a void in consumer awareness of the quality of bottled drinking water. Therefore, ACWA strongly supported the inclusion of SDWA language requiring a feasibility study by FDA on methods of informing customers on the quality of bottled water. Specifically, ACWA feels that bottled water suppliers should be subject to the same federal right to know requirements as public water systems.

While ACWA is aware that the label on a bottle of water cannot hold the information that is required by the CCR, ACWA believes that the label can contain the following:

Association of California  
Water Agencies  
910 K Street, Suite 100  
Sacramento, California  
95814-3512  
  
916/441-4545  
FAX 916/325-4849  
www.acwanet.com

Hall of the States  
400 N. Capitol St., N.W.  
Suite 357 South  
Washington, D.C.  
20001-1512

202/434-4760  
FAX 202/434-4763

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- The source of the bottled water,
- Information on any additional treatment,
- A statement that the bottled water meets all applicable FDA (and/or) EPA requirements, and
- A toll-free number for consumers to obtain a brochure on bottled water quality information that is in a format as similar to the CCR as possible.

This label, and the follow-up information provided by the bottler, would finally provide the necessary information to consumers to allow them to make a knowledgeable decision.

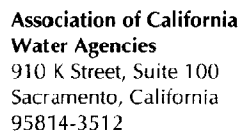
ACWA appreciates the opportunity to comment and urges FDA to move ahead and finalize the study so that regulations can be developed and implemented. Water systems around the country have completed their first CCR in 1999 and, for the consumer's sake, it would be beneficial to have the new bottled water labels available as soon as possible.

If you have any questions, please contact Krista Clark at 916-441-4545.

Sincerely,

A handwritten signature in black ink that reads "Dan Smith". The signature is fluid and cursive, with the first name "Dan" and last name "Smith" clearly distinguishable.

Dan Smith  
Director of Regulatory Affairs



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